

January 29, 2022

BY ECF – VIA FEDERAL DEFENDERS

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

**RE: United States v. Michael Avenatti
19 Cr. 374 (JMF)**

Dear Judge Furman:

Yesterday evening at 5:05 p.m., defendant provided the Government with his expected witness list. That list is attached as Exhibit A to this letter. Since that time, we have identified one additional witness – Ms. Tracey Guest.

At 5:29 p.m. yesterday, defendant sent the list of witnesses for Monday to the Government. That list (in order of testimony) was as follows: Mr. Luke Janklow, Mr. Jason Fischer, Mr. John Dean Barrale, Mr. David Karbley. The Government asked a question regarding the list at 5:36 p.m. At 5:58 p.m., we informed the Government that due to a travel conflict, we would call Mr. Justin Loupe before Mr. Karbley. We also expect to have Mr. Carlos Colorado available to testify on Monday if needed due to Mr. Karbley's travel.

My testimony will likely occur at the end of the defense case.

I apologize to the Court for any oversight in not providing the witness list to the Court. In determining whether there was a requirement for me to do so, we reviewed the Amended Scheduling Order (Dkt. 160) and Your Honor's Individual Rules prior to yesterday evening.

Respectfully Submitted,

/s/

Michael J. Avenatti
Defendant

Exhibit A

January 28, 2022

By Email – via Federal Defenders

**Re: *United States v. Michael Avenatti*
 19 Cr. 374 (JMF)**

Witness List:

1. John Dean Barrale
2. Carlos Colorado
3. Glendon Crain
4. John Drum
5. Jason Fischer
6. Luke Janklow
7. David Karbley
8. Justin Loupe
9. Richard Marshack
10. Denver Nicks

Mr. Avenatti reserves the right to testify.

Respectfully submitted,

_____/s/
Michael J. Avenatti
Defendant